

1 RAJI RAJAN, ESQ., CSB#139834
2 LAW OFFICES OF RAJI RAJAN
3 355 WEST OLIVE AVENUE, SUITE 101
4 SUNNYVALE, CA 94086
5 Telephone: 408-730-9492
6 Fax: 408-739-9687

FILED

2008 JAN 30 P 3:10

RICHARD W. WIEKING
CLERK
U.S. DISTRICT COURT
NO. DIST. OF CA. S.J. *[Signature]*

7

8

9

10 Attorney for Marry C. Hugdahl

11

12

13

14 *Urgent*

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA**

17 **SAN JOSE DIVISION**

18 ANNUITY & LIFE REASSURANCE) CASE NO.: C 07 5502 ✓
19 AMERICA INC. (formerly known as) ANSWER TO THE
20 CAPITOL BANKERS LIFE INSURANCE) COMPLAINT FOR
COMPANY),) INTERPLEADER AND
Plaintiff,) DECLARATORY RELIEF
vs.)
21 JON C. HUGDAHL, an individual and)
TRUSTEE of the JON S. HUGDAHL)
FAMILY TRUST, dated 12/19/94;)
PAUL A. HUGDAHL, an individual; and)
MARRY C. HUGDAHL an individual,)
Defendants.)
_____ /

22
23
24 1. Defendant denies BECAUSE OF LACK OF SUFFICIENT INFORMATION OR
25 BELIEF TO ANSWER, each allegation to the following numbered paragraphs of the
26

27 ANSWER TO THE COMPLAINT FOR INTERPLEADER AND DECLARATORY RELIEF
CASE NO.: C 07 5502

28 PAGE 1 OF 2

1 complaint.

2 Paragraph 1, 5,6, 13a, 13b., 14,15,16.

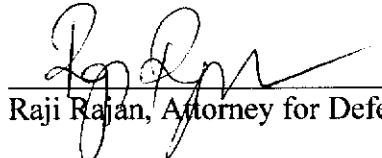
3 2, Defendant believes to be true the allegation to the following numbered
4 paragraphs of the complaint.

5 Paragraphs 2, 3, 4, 7,8,9,10,11, 12
6

7 Wherefore, the defendant MARRY C. HUGDAHL prays for a judgment as follows.
8

9 1. Defendant requests to deny the attorney fees and costs to plaintiff.
10 2. Defendant requests to award to defendant the community share of the insurance
11 proceeds.
12 3. Defendant requests for further relief as the Court may deem proper.

13
14 January 28, 2008

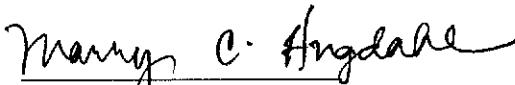

15 Raji Rajan, Attorney for Defendant

16
17 VERIFICATION

18 I am the defendant in this matter. I have read the foregoing Complaint on Interpleader and
19 know the contents thereof. It is true to the best of my knowledge, and on the basis of records
20 and factual information.

21 I declare under penalty of perjury under the laws of the State of California that the foregoing is
true and correct.

22 EXECUTED ON JANUARY 27 2008, SUNNYVALE, CA 94086

23
24 
25 MARRY C. HUGDAHL

PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

I am a resident of the State of California, I am over the age of eighteen years and not a party to the within action; my business address is 355 West Olive Avenue, Suite 101, Sunnyvale, CA 94086.

On the date executed below, I served the within copies of the ANSWER TO THE INTERPLEADER on the parties in the said action by placing a true copy thereof, enclosed in a sealed envelope, with postage thereon fully prepaid, in the United States mail at Sunnyvale, addressed as follows:

David L. Samuelson, Esq.
897 Independence Avenue, Suite 2D
Mountain View, CA 94043

Chris Ferry, Esq..
Kelly, Herlihy and Klein
44 Montgomery Street, Suite 2500
San Francisco, CA 94101-4602

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 01/28/08 at Sunnyvale, CA 94086



Raji Rajan